

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

*SAN JOSE DIVISION*

THE UNITED STATES OF AMERICA

VS

ROBERT LEONARD TRUHITTE and  
KAREN ELIZABETH LAUBENTHAL

FILED  
OCT 03 2019  
CLERK SUSAN Y. BOONG  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

INDICTMENT **CR 19 00501 EJD**

COUNT ONE: 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B) – Conspiracy to Possess with  
Intent to Distribute Methamphetamine **SVK**

COUNT TWO: 21 U.S.C. § 841(a)(1) and (b)(1)(B)(viii) – Possession with Intent to  
Distribute Methamphetamine

COUNT THREE: 21 U.S.C. § 841(a)(1) and (b)(1)(C) – Possession with Intent to  
Distribute Methamphetamine; Aiding and Abetting

*A true bill.*



*Foreperson*

Filed in open court this 3 day of October A.D. 2019

  

United States Magistrate Judge  
*Nathaniel C. Coughlin*

Bail. \$ no bail arrest warrant, for both defendants.

DAVID L. ANDERSON (CABN 149604)  
United States Attorney

**FILED**  
OCT 03 2019  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT LEONARD TRUHITTE, and  
KAREN ELIZABETH LAUBENTHAL,

Defendants.

**CR 19 00501**

CASE NO.

**EJD**  
**SVK**

VIOLATIONS:

21 U.S.C. §§ 846, 841(a)(1), and (b)(1)(B) –  
Conspiracy to Possess with Intent to Distribute  
Methamphetamine;  
21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(viii) –  
Possession with Intent to Distribute  
Methamphetamine;  
21 U.S.C. §§ 841(a)(1) and (b)(1)(C) – Possession  
with Intent to Distribute Methamphetamine;  
21 U.S.C. § 853 – Criminal Forfeiture Allegation

INDICTMENT

The Grand Jury charges:

COUNT ONE: (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B) – Conspiracy to Possess with Intent to  
Distribute Methamphetamine)

Beginning on or about July 10, 2019, and continuing to on or about July 16, 2019, in the  
Northern District of California, the defendants,

ROBERT LEONARD TRUHITTE, and  
KAREN ELIZABETH LAUBENTHAL,

and others known and unknown to the Grand Jury, did knowingly and intentionally conspire to possess

INDICTMENT

with intent to distribute 50 grams and more of a mixture and substance containing a detectible amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and (b)(1)(B)(viii).

COUNT TWO: (21 U.S.C. § 841(a)(1) and (b)(1)(B)(viii) – Possession with Intent to Distribute Methamphetamine)

On or about July 16, 2019, in the Northern District of California, the defendants,

ROBERT LEONARD TRUHITTE, and  
KAREN ELIZABETH LAUBENTHAL,

did knowingly and intentionally possess with intent to distribute 50 grams and more of a mixture and substance containing a detectible amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii).

COUNT THREE: (21 U.S.C. § 841(a)(1) and (b)(1)(C) – Possession with Intent to Distribute Methamphetamine; Aiding and Abetting)

On or about July 10, 2019, in the Northern District of California, the defendants,

ROBERT LEONARD TRUHITTE, and  
KAREN ELIZABETH LAUBENTHAL,

did knowingly and intentionally possess with intent to distribute methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, and aided and abetted the same, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18 United States Code Section 2.

FORFEITURE ALLEGATION: (21 U.S.C. § 853(a))

The allegations contained above are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853(a).

Upon conviction of any of the offenses alleged in Counts One through Three above, the defendants,

ROBERT LEONARD TRUHITTE, and  
KAREN ELIZABETH LAUBENTHAL,

1 shall forfeit to the United States all right, title, and interest in any property constituting and derived from  
 2 any proceeds the defendant obtained, directly or indirectly, as a result of such violations, and any  
 3 property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of  
 4 such violations, including but not limited to the following:

- 5 a. An SCCY CPX-2 pistol with Serial Number 370058 seized on July 16, 2019 from  
 6 TRUHITTE's hotel room in Santa Cruz, California.
- 7 b. A magazine and ammunition for the SCCY CPX-2 pistol, seized on July 16, 2019  
 8 from TRUHITTE's hotel room in Santa Cruz, California.
- 9 c. \$14,145 in cash seized on July 16, 2019 from TRUHITTE's hotel room in Santa  
 10 Cruz, California; and
- 11 d. a forfeiture money judgment equal to the total gross proceeds obtained by the  
 12 defendant as a result of the offenses.

13 If any of the property described above, as a result of any act or omission of the defendant:

- 14 a. cannot be located upon exercise of due diligence;
- 15 b. has been transferred or sold to, or deposited with, a third party;
- 16 c. has been placed beyond the jurisdiction of the court;
- 17 d. has been substantially diminished in value; or
- 18 e. has been commingled with other property which cannot be divided without  
 19 difficulty,

20 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,  
 21 United States Code, Section 853(p).

22 All pursuant to Title 21, United States Code, Section 853, and Federal Rule of Criminal  
 23 Procedure 32.2.

24 ///

25 ///

26 ///

27 ///

28 ///

1 DATED:

10-3-19

A TRUE BILL

  
FOREPERSON

4 DAVID L. ANDERSON  
United States Attorney

5   
6 MARISSA HARRIS

7 JIMMY DOAN  
Assistant United States Attorneys



AO 257 (Rev. 6/78)

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING
**OFFENSE CHARGED**
 Count One: 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B) –  
 Conspiracy to Possess with Intent to Distribute  
 Methamphetamine; Count Two: 21 U.S.C. § 841(a)(1) and (b)  
 (1)(B)(viii) – Possession with Intent to Distribute  
 Methamphetamine; Count Three: 21 U.S.C. § 841(a)(1) and  
 (b)(1)(C) – Possession with Intent to Distribute  
 Methamphetamine; Aidina and Abetting

☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony
**PENALTY:**

see attached sheet

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

**DEFENDANT - U.S.**

Robert Leonard Truhitte &amp; Karen Elizabeth Laubenthal

DISTRICT COURT NUMBER

CR 19 00501 EJD

**PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

Christopher Jones, Santa Cruz Sheriff's Office

☐ person is awaiting trial in another Federal or State Court,  
 give name of court

☐ this person/proceeding is transferred from another district  
 per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of  
 charges previously dismissed  
 which were dismissed on motion  
 of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW  
DOCKET NO.
☐ this prosecution relates to a  
 pending case involving this same  
 defendant
MAGISTRATE  
CASE NO.
☐ prior proceedings or appearance(s)  
 before U.S. Magistrate regarding this  
 defendant were recorded under

Name and Office of Person

Furnishing Information on this form DAVID L. ANDERSON

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned) AUSA Marissa Harris

**DEFENDANT****IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

- 1) ☐ If not detained give date any prior  
summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4) ☐ On this charge
- 5) ☒ On another conviction
- 6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer ☐ Yes  
 been filed? ☐ No

 If "Yes"  
 give date  
 filed
DATE OF  
ARREST

Month/Day/Year

Or... if Arresting Agency &amp; Warrant were not

DATE TRANSFERRED  
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted
**PROCESS:**
☐ SUMMONS ☐ NO PROCESS\* ☒ WARRANT

Bail Amount: None

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

Date/Time:

Before Judge:

Comments:

 \* Where defendant previously apprehended on complaint, no new summons or  
 warrant needed, since Magistrate has scheduled arraignment

**UNITED STATES V. TRUHITE, ET AL.**  
**PENALTIES**

**Count One:**      **21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(B)(viii) (Conspiracy to Possess with Intent to Distribute Methamphetamine)**

- Minimum Prison Term: 5 years
- Maximum Prison: 40 years
- Maximum Fine: \$5,000,000
- Minimum Supervised Release: 4 years
- Forfeiture
- Potential Deportation
- Mandatory and discretionary denial of benefits
- Special assessment fee: \$100

**Count Two:**      **21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii) (Possession with Intent to Distribute Methamphetamine)**

- Minimum Prison Term: 5 years
- Maximum Prison: 40 years
- Maximum Fine: \$5,000,000
- Minimum Supervised Release: 4 years
- Forfeiture
- Potential Deportation
- Mandatory and discretionary denial of benefits
- Special assessment fee: \$100

**Count Three:**      **21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) (Possession with Intent to Distribute Methamphetamine)**

- Maximum Prison: 20 years
- Maximum Fine: \$1,000,000
- Minimum Supervised Release: 3 years
- Forfeiture
- Potential Deportation
- Mandatory and discretionary denial of benefits
- Special assessment fee: \$100